

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEALED

UNITED STATES OF AMERICA

v.

BRUCE A. BROWN, a/k/a "Arki,"

Defendant

Criminal No. 20cr 10041

Violations:

Count One: Conspiracy to Commit Sex
Trafficking

(18 U.S.C. § 1594(c))

Counts Two, Four, Five, and Six: Sex
Trafficking by Force, Fraud and Coercion

(18 U.S.C. §§ 1591(a)(1) and (b)(1))

Count Three: Sex Trafficking of a Minor and by
Force, Fraud and Coercion

(18 U.S.C. §§ 1591(a)(1) and (b)(1) and (2))

Count Seven: Transportation of a Minor with
Intent to Engage in Criminal Sexual Activity

(18 U.S.C. § 2423(a))

Sex Trafficking Forfeiture Allegation:

(18 U.S.C. § 1594(d) and 28 U.S.C. § 2461(c))

Transportation Forfeiture Allegation:

(18 U.S.C. § 2428(a), and 28 U.S.C. § 2461(c))

Forfeiture Allegation:

(18 U.S.C. § 981(a)(1)(C) and

28 U.S.C. § 2461(c))

INDICTMENT

General Allegations

1. BRUCE BROWN a/k/a "ARKI" ("BROWN") was an individual residing in
Massachusetts.

2. Victim A is an individual known to the Grand Jury.

3. Victim B is an individual known to the Grand Jury.

4. Victim C is an individual known to the Grand Jury.

5. Victim D is an individual known to the Grand Jury.

COUNT ONE
(Conspiracy to Commit Sex Trafficking)
(18 U.S.C. § 1594(c))

The Grand Jury charges:

6. The Grand Jury re-alleges and incorporates by reference paragraphs 1-5 of this Indictment.

7. From at least in or about April 2012 through at least in or about June 2012, in the Districts of Massachusetts, Maine, New Jersey, and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

and others known and unknown to the Grand Jury, did conspire with each other to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means Victims B and C, in and affecting interstate commerce, knowing and in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victims B and C to engage in commercial sex acts, and knowing and in reckless disregard of the fact that Victim B had not attained the age of 18 years, in violation of Title 18, United States Code, Sections 1591 (a)(1), (b)(1) and (2).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

(Sex Trafficking by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

8. From at least in or about January 2004 through in or about December 2007, in the Districts of Massachusetts, New York, Columbia, and Nevada, and elsewhere, the defendant,

BRUCE BROWN, a/k/a, "ARKI,"

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, i.e., Victim A, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim A to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT THREE

(Sex Trafficking of a Minor and by Force Fraud or Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1) and (2))

The Grand Jury further charges:

9. From at least in or about April 2012 through in or about June 2012, in the Districts of Massachusetts and Maine, and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, i.e., Victim B, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim B to engage in a commercial sex act, and knowing and in reckless disregard of the fact that Victim B had not attained the age of 18 years.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1) and (2).

COUNT FOUR

(Sex Trafficking by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

10. From at least in or about April 2012 through in or about June 2012, in the Districts of Massachusetts, Maine, New Jersey, and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, i.e., Victim C, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim C to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT FIVE

(Sex Trafficking by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

11. From at least in or about August 2014 through in or about June 2018, in the Districts of Massachusetts, Hawaii, New Jersey, Pennsylvania and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, i.e., Victim D, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim D to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT SIX

(Sex Trafficking by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

The Grand Jury further charges:

12. From at least in or about May 2019 through in or about July 2019, in the Districts of Massachusetts, Pennsylvania, and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, i.e., Victim D, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim D to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT SEVEN

(Transportation of a Minor with Intent to Engage in Criminal Sexual Activity)
(18 U.S.C. § 2423(a))

The Grand Jury further charges:

13. On or about April 20, 2012, in the Districts of Massachusetts and Maine, and elsewhere, the defendant,

BRUCE BROWN, a/k/a “ARKI,”

did knowingly transport an individual, i.e., Victim B, who had not attained the age of 18 years, in interstate commerce, that is, between Massachusetts and Maine, with the intent that Victim B engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

SEX TRAFFICKING FORFEITURE ALLEGATION
(18 U.S.C. § 1594(d) and 28 U.S.C. § 2461 (c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1591 and 1594, set forth in Counts One through Six of this Indictment, the defendant,

BRUCE BROWN a/k/a “ARKI”,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), and Title 21 United States Code, Section 2461(c): (1) the defendant’s interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property; and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offenses, and any property traceable to such property.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 1594(d) and Title 21 United States Code, Section 2461(c), as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 1594(d), and Title 28, United States Code, Section 2461(c).

TRANSPORTATION FOR PROSTITUTION FORFEITURE ALLEGATION

(18 U.S.C. § 2428(a) and 28 U.S.C. § 2461(c))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 2423, set forth in Count Seven of this Indictment, the defendant,

BRUCE BROWN a/k/a “ARKI”,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), and Title 21 United States Code, Section 2461(c): (1) the defendant’s interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (2) any property, real or personal, which constitutes or is derived from any proceeds the defendant obtained, directly or indirectly, as a result of such offense.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2428(a), and Title 21 United States Code, Section 2461(c), as a result of any act or omission of the defendant –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 2428(a), and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1591, 1594, and 2423(a), set forth in Counts One through Seven of this Indictment, the defendant,

BRUCE BROWN a/k/a “ARKI”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant –


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.


All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL


FOREPERSON


MACKENZIE A. QUEENIN
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 13th, 2020
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK
2:31 p.